

# TAYLOR & COHEN LLP

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June 29, 2021

*By ECF and Fax*

The Honorable Paul G. Gardephe  
United States District Court  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: U.S. v. Robert Adams, 20 CR 494-PGG – Motion to Modify Bail Conditions**

Dear Judge Gardephe:

I represent Robert Adams. I am writing to request a modification of Mr. Adams' bail conditions to permit him to travel into the District of New Jersey and the District of Connecticut, solely for purposes of employment. Under the terms of Mr. Adams' bond, his travel is currently restricted to SDNY and EDNY. The reason for this request is to improve Mr. Adams' ability to support himself financially while he is awaiting trial.

Both the government and Pretrial Services consent to this request.

Thank you for your attention.

Respectfully,




Zachary S. Taylor

cc: Rushmi Bhaskaran, Esq. (by ECF)

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**  
  
Paul G. Gardephe, U.S.D.J.

**Dated:** July 2, 2021